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March 3, 2022

**VIA ECF**

Honorable Marcia M. Henry  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Kellner v. City of New York, et al.  
Docket No. 17-cv-01268 (MKB) (MMH)**

Dear Judge Henry:

I represent Plaintiff in the above matter and submit this joint status report, on behalf of the parties, pursuant to the Court's order dated January 13, 2022.

The parties wish to advise the Court that they are proceeding with depositions as previously planned. We anticipate that we will continue to schedule and conduct depositions through the end of April. Nearly all of the depositions are of non-parties to this action, and the parties are endeavoring to work constructively to schedule the remaining depositions so that they are completed by May 1, 2022. The Kings County District Attorney's office has just produced nearly 800 audio recordings following the Protective Order that was issued by the Court yesterday. The parties will be reviewing those recordings as depositions are ongoing. With the foregoing in mind, the parties ask to provide an updated status report to the Court in early April.

The parties thank the Court for its attention to this matter.

Respectfully,

*Niall MacGiollabhui*

Niall MacGiollabhui

cc: Susan P. Scharfstein, Esq.